

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

**SHEILA BELL
CHRISTOPHER BELL, SR.
LENNON BROWN
JOURDAN BROWN
CHRISTOPHER BELL
CHRISTIAN BELL
ANNA STASIA BELL
ELIJAH BELL**

**United States Courts
Southern District of Texas
FILED**

FEB 18 2005

Michael N. Milby, Clerk of Court

VS.

**CHERYL TRIPLETT
MARTHA LIVINGSTON
RICHARD KING
CHERYL MCCARTY
JACK LAWRENCE
MARY OBIALO
DR. JAMES LUKEFAHR, MD.
DR. GAYANI SILVA
LEANN STUBBS
CASA
TERRY WARD
ELAINE MICHAEL
RONALD GIPSON
CHRISTINE MANGLE
HRH INSURANCE
MR. ROOTER
TONYA BALL
BECKY JOHNSON**

CLAIMS AND COMPLAINT

TO THE HONORABLE JUDGE JOHN R. FROESCHNER:

**COME NOW the Plaintiffs, Christopher Bell, Sr., Sheila Bell, Lennon Brown,
Jourdan Brown, Christopher Bell, Christian Bell, Anna Stasia Bell and Elijah Bell,
passionately in the behalf of our Family.**

Plaintiffs do file this our lawsuit under 42 USC 1983, The Discrimination Act, The False Claims Act, The "Whistleblower" Act, and Failure To Protect.

Plaintiffs are suing for "full-custody" of our children also named as Plaintiffs in this lawsuit; for our family to be "reunited;" and for Punitive and Compensatory Damages, Equitable and Injunctive Relief in the amount of \$106,000.000.00.

Plaintiffs do file this lawsuit against "all" of the Defendants named in this lawsuit for committing and/or "aiding and abetting" others in committing the following acts: negligence; intentional infliction of distress; filing a false report; making false statements; alienation of affection of our family; interference with family relations; fraud; conspiracy; harassment; perjury; endangering a child; failure to protect our children; child abuse; retaliation; Official Abuse & Oppression; false imprisonment; false arrest; slander; libel; defamation of character; withholding of evidence; suppression of evidence and Violation of the Civil Rights of our entire family.

Plaintiffs also maintain that the Defendants were "negligent," "malicious," acted in "bad faith" and committed and/or "aided and abetted" others in committing one or more of the following acts: failed to properly maintain and monitor our case file; were negligent in destroying, concealing or tampering with evidence involving our case; failed to conduct a thorough and objective investigation; failed to alert proper authorities of crimes committed to our children "while" in State Custody; failed to properly supervise employee's and any other State Tort applicable under the Texas Tort Statutory Code.

Plaintiffs are suing “all” of the Defendants in their “individual capacities” as “persons” acting under “the color of the law” who acted with malice, forethought, ill intent, in “bad faith,” and, who did not act in “good-faith,” in violation of “clearly” established law and the Constitutional Rights of our entire family.

All of the Defendants engaged in activity which led to the “deprivation” and “violation” of the Civil Rights of all of the Plaintiffs named in this lawsuit and the separation of our entire family: Christopher Bell, Sr., Sheila Bell, Lennon Brown, Jourdan Brown, Christopher Bell, Christian Bell, Anna Stasia Bell, and Elijah Bell.

State Defendants, CASA, and UTMB all tried to “make a name for themselves” at our family’s expense.

A. FRAUD

State Defendant's are "scamming" the Government and Taxpayers and received funds using "fake" cases, "old," and "misleading" information they "illegally" obtained. Our case, and the reason for this lawsuit, is a prime example.

The Defendants named in this lawsuit perpetrated "fraud" against Plaintiff's, Taxpayers and the Federal Government-via Medical bills, and/or aided and abetted others in doing so by: misusing State and Federal Funds to pursue our case "after" becoming aware they had no legal basis to pursue by Law; pursuing a case against Plaintiff's through "illegal" means using "old," "closed," and "ruled-out" cases; lying on official court documents as to the facts; falsifying documents; conspiracy; perjuring testimony; and fabricating false allegations etc., to make their case. CPS Defendants then passed-on their "illegally derived" case against Plaintiffs too the State Judge.

The State Judge in Plaintiffs case "publicly" declared she would "never" give us our children just "two-months" into our case, which meant Plaintiffs family would "never" be "reunited" at the State Level, violating State Law and our Civil Rights.

Plaintiffs sought Federal Venue as the direct result of the actions of the Defendants and the State Judges Statements once she made it "extremely apparent" receiving or retaining "full-custody" of our children and being "reunited" as a family, "would never" happen at the State Level. Judge Suzanne Schwab-Radcliffe reiterated her statements on "cassette tapes," which she herself recorded during hearings.

The State Judges statements prejudiced the entire State against Plaintiffs and resonated throughout the duration of CPS' 2001 Case against Plaintiffs, up too Trial. Each and every single person, entity and agency affiliated with the State systematically made recommendations against us immediately following her statements.

Judge Radcliffe's statements made receiving or retaining custody of our children "impossible" under such circumstances since "everybody," including our Defense Attorney's knew it "would not" happen. So much so until, my Attorneys advised me to surrender my Parental Rights. Plaintiffs were denied due process as a result.

All of the Defendants "followed-suit" in helping CPS purse their "illegal" case against Plaintiffs, and/or failed to conduct a "thorough and objective" investigation "before" making "recommendations" based on "false information" which harmed our family and caused us to be separated for "long extended periods" of time.

Plaintiffs sought Federal Venue as the "direct result" of the Defendants actions and the Judges statements regarding "full-custody," after it became apparent receiving or retaining it no longer became an option for us in any State Venue until this very day.

"ALL STATE PROCEEDINGS FROM THAT POINT ON WERE MERE "FORMALITY'S" CONCOCTED TOO: "ENTRAP" PLAINTIFFS; ILLEGALLY GARNISH FUNDS FOR A CASE CPS DID NOT HAVE "LEGAL" BASIS TO PURSUE; AND, A TOTAL "WASTE" OF TAXPAYER, STATE AND FEDERAL TIME AND MONEY. ALL HEARINGS ON THE MATTER WERE "POINTLESS" SINCE THE STATE HAD ALREADY "OFFICIALLY" MADE-UP-IT'S-MIND "NEVER" TO RETURN OUR CHILDREN TOO US OR, REUNITE OUR FAMILY.

The Defendants “illegally” pursued our case under the “guise” there was actually a case, and hearings, a “farce.” Evidence concurs and substantiates Plaintiffs claims.

On December 21, 2001, Richard King (CPS), Cheryl McCarty (CPS), Det. Joey Quiroga and Officer Schwartz (Galveston Police Department), all “acting under the color of the law,” and after conducting a “non-consensual” investigation, interrogation, questioning and search of our family and residence, all left our residence without incident. No one from our family was arrested, taken into Custody, or charged with any sort of a crime, whatsoever throughout the duration of the 2001 case.

State and Local Officials, “acting under the color of the law,” then left all six of our children in our care and custody additional days after finding “no evidence of abuse or neglect,” as required by law after finding our children at “... no risk....”

Our case, per Richard King (CPS), and witnessed by Cheryl McCarty (CPS) and Galveston Police, while acting under “the color of the Law,” was “over!” Hence, the only reason State and Local officials could have “legally” left our children in our care in the first place. State Defendants and Police each proved by their actions 1) Plaintiff’s broke no laws, and, 2) none of my six children were in any apparent danger, whatsoever.

In the “absence of abuse and neglect,” State Defendant’s “illegally” pursued a case against Plaintiff’s “an additional 16-months,” “scamming” the Government and Taxpayer’s along the way, and, violating our family’s Civil Rights in the process.

State Defendant’s acted with “malice, forethought, and in bad faith,” by pursuing a CPS case against Plaintiff’s which they “knew” they had no legal basis to pursue.

State Defendants stalked and harassed our family from Christmas throughout the duration of the case. CPS, UTMB Records and other "crucial" evidence confirm State Defendants conspired to take our children in the absence of "abuse or neglect" as required by State Law. Defendants were negligent and violated State Law and our Civil Rights in doing so.

State Defendants: "rigged" State Proceedings; "fixed" hearings; engaged in "cover-ups" to hide "abuse and neglect" which occurred to our children while in State Custody; "covered-up" problems with "placements" involving our children which endangered their lives; made referral's and appointments specifically designed to "entrap" Plaintiffs and "set-us-up"; made recommendations which were "not in the best interest of our children;" concealed the fact that CPS and others lost my sons and did not know where they were, then failed to notify authorities of their abduction; got "false information" from false witnesses to corroborate fabricated accusations; defrauded the Government and Taxpayers through their "illegally" obtained cases, and participated in a State-Wide scam causing, Plaintiff's, (Christopher and Sheila Bell) to loose full-custody of: Lennon Brown, Jourdan Brown, Christopher Bell, Christian Bell, Anna Stasia Bell and Elijah Blue Bell, our precious children whom we love so dearly and to Terminate our Parental Rights, at the expense of the Government and Taxpayer's.

CPS documents confirm our children were "healthy," however, State Defendant's billed the Government for medical services our children did "not" need.

State Defendants pursued our case they "illegally" obtained, "bilking" the Government and Taxpayers out of money for unnecessary services, in the absence of "abuse or neglect." State Defendant's committed "Fraud" in doing so.

State Defendants testimony and taped evidence prove State Officials saw “no signs of abuse or neglect” of our children. Thus, CPS had no legal basis to take our children from us. The fact that CPS took them in the absence of “evidence of abuse or neglect,” proves “conspiracy.”

As part of the scam, it was simply more “economically feasible” for State Defendants to take our children than to allow them to remain with us. This practice is “routinely” performed by State Defendants, CASA, Terri Ward, UTMB Hospital Staff etc. who “prey” upon minorities, biological parents, poor or low-income families, and scout CPS cases for the agency.

Through “fraud,” State Defendant’s took our children to “legitimize” referrals and “justify” billing for services and to receive funding, which they did indeed do. In the absence of evidence “abuse or neglect,” State Defendant’s simply conjured-up some, scamming the Government and Taxpayers along the way, “using” our children.

State Defendant’s had enough funding, “clout,” local and state corroborator’s to make any case appear “legit.” That, along with Ms. Triplett’s personal grudge against Plaintiff for asserting our Right to Privacy in 1998, of which she testified during the 2001 State Trial, sealed our fate for a CPS case.

Fabricating a CPS case against Plaintiffs was an easy feat for State Defendant’s and UTMB Staff to accomplish using State-Given Authority since nobody checks. Defendants did so in our case.

The Defendants got away with fabricating our case and conspiracy, because no outside agency investigated or checks exactly how CPS “illegally” obtains “so many” cases.

State Defendant's got away with fraud and other illegal activity simply because there was simply was no "legitimate" outside agency for us to report CPS fraud and abuse too. Everyone naively "assumes" that "all" CPS cases are "legitimate," when they're "not." Ours wasn't.

Being "black," "another minority," "poor," "low-income," or just a "biological parent," automatically qualifies families for a CPS case in Galveston County under Cheryl Triplett's Direction, her subordinates and State Affiliates.

State Defendant's derived our case through "racial profiling," "discriminatory" and other "illegal" factors. We presumably "fit their profile." State Defendants "illegally" obtained our case to get local, state and federal funding. It's "common procedure" by UTMB Staff, State and other Defendants.

The "scam" went as follows: Ambulances in Galveston automatically take their calls to UTMB Hospital. CPS has a "special arrangement" with UTMB Hospital, Doctor's and Staff, which "scout" for potential CPS cases, including a "UTMB Shuttle" directly in front of the CPS building.

Evidence confirms, upon arriving at UTMB, Leann Stubbs (UTMB Social Worker), acting as a CPS informant, interrogated my husband then tipped off CPS about our family using "false" information as she done before. Ms. Stubbs routinely "selected" our family for CPS cases, establishing a "pattern" over the course of several years. No other hospital or Social Worker treated us this way.

UTMB Hospital Records confirm that Ms. Stubbs routinely “scouts” for potential CPS cases, makes referrals, and acts as a “CPS Informant.”

By her own admission, Ms. Stubbs had made other CPS referrals on our family before. Our family was “singled-out” by Ms. Stubbs. UTMB Hospital Records confirm Ms. Stubbs also made the 2001’ referral to CPS.

False and misleading information by Ms. Stubbs got “the CPS ball” rolling again, and another CPS referral for our family. After making several “discriminatory,” and “incriminating,” statements regarding our family, Ms. Stubbs merely “passed-them-on” to CPS to help build their “illegal” case against us, and make it appear “legit.”

Then, in a collective effort, State Defendants, Ms. Stubbs, Dr. Lukefahr and others, conspired their “illegal and bogus” case against Plaintiff’s.

State Defendants handled “official” documentation, paperwork and Court proceedings. Dr. Lukefahr and Ms. Stubbs testified as witnesses, confirmed or provided “Sworn Affidavits” for CPS saying whatever it took to build the 2001 CPS case against Plaintiffs.

Repeated referrals were then made to make their case appear “legitimate” on official documents. Implying as though, “several” referrals were made, when in reality, all of the CPS referrals were the result of the same conspiracy; involved the very same people; entailed the same “old” information for the very same case, “ours.”

Each had too “consult” with each other too corroborate stories. Keeping in mind, these were “several different” people, agencies and entities involved in the very same case, that were repeatedly saying the same things both officially and unofficially. These were “old” cases (1998/1999) “linked” together for the 2001 CPS Case.

The medical neglect “referrals” all involved “the same people, the same hospital, the same information, the same details and CPS. With familiar names like Cheryl Triplett, Leann Stubbs and Dr. James Lukefahr “reappearing” on each case.

No other Hospital, medical facility or Staff ever made CPS referrals on our family, except UTMB Hospital.

UTMB Hospital services CPS-Galveston, “exclusively.” Between the two of them, funds are channeled through these two “mammoth” entities “exclusively.”

In our case State Defendants used the same “old” information to make the 2001 CPS case, garnishing “new” funds, for “old, closed and ruled-out cases,” with a common denominator, Cheryl Triplett. Familiar names routinely resurfaced like: Dr. Lukefahr, Leann Stubbs, and other CPS and UTMB Staff.

Although Dr. Lukefahr stated his findings were “inconclusive” January 2002, Defendants pretended the opposite for over 16-months throughout State Proceedings up to Trial, garnishing funds for their fabricated case the entire time. It was their routine.

An “inconclusive” allegation of sexual abuse by CPS Vet-Dr. Lukefahr is all it takes for UTMB and CPS to “seal” a CPS case and garnish funds. So, they use it often. The Defendants did so in Plaintiffs case.

Dr. James Lukefahr is considered an “expert witness” and is “routinely” called-on by the Prosecution, Cheryl Triplett, her subordinates and other Affiliates, who also serve on the same boards together, testify in each others behalf, make cases for each other and share common financial interests. It’s an atmosphere of fraud and conspiracy.

State Defendants “used” our family to make money off of our children for over 16-months with “no evidence” a crime was committed. Like pimps, State Defendants “used” our children to obtain money and their own selfish agenda’s.

Evidence confirms sexual abuse allegations are often used by the Defendants to “build cases.” That false allegation was “tagged-on” to our case for this purpose, and to retaliate against Plaintiff’s for asserting our Civil Rights as American Citizens.

Our case then went to Judge Radcliffe, who by her own admission is a “public” proponent of Adoption; the States Foster Care System, and only Orders children to Foster Care or Adoption, and the rest “wards” of the State.

Evidence proves that the overwhelming consensus throughout the State is that Plaintiffs, other minorities, low-income or biological parents do not deserve Families or Constitutional Rights. State decisions, rulings and recommendations made by CPS, Terri Ward, CASA, Christine Mangle, Prosecutor’s etc., along with each and every single Defendant named in this lawsuit, confirm State Defendant’s “obvious” bias.

State Defendants simply fabricated “allegations” and corroborated their stories. By the time Plaintiffs were acquitted by a Grand Jury, the Defendants actions had already “devastated” our family, causing “immeasurable” damage, especially to our children.

The named officials in this case performed criminal acts while acting as officials of the State “under the color of the law,” and deserve no immunity whatsoever.

One phone call, via a “CPS referral”, was all it took to put our family’s Rights and lives on “lockdown” once CPS initiated their “illegal and bogus” case against us.

Behind closed doors, State proceedings and the Trial, CPS “stripped” our family of every single “HUMAN RIGHT” afforded to every American Citizen. I was even “watched” in the “restroom.”

The States “bias” was obvious. There was not a single “Family Advocate” present during any of our hearings or Trial. This was Discriminatory on the Defendants part.

Although CPS initiated its last case against us December 21, 2001, in a State “conspiracy,” less is said about that date than any other.

The “crux” of Plaintiff’s case hinges around circumstances surrounding the events of “December 21, 2001.” A “whole-lot more” happened that day than either UTMB Hospital, the Defendants or Police are willing to disclose, and details kept secret.

Neither State Defendants or Police removed any of our children from us for a reason. “Legally, they couldn’t.” So, Defendants did so “illegally,” defrauding the Government and Taxpayers in the process. Nor, did State Defendants file any other sort of Protection or legal document for “Two-Full-Days” after Mr. King declared the case “over,” with reason.

The fact that Police and State Defendants left our children with us proves our children were in “no apparent danger.” State Defendants did not see our oldest “five” children until days later. Hence, no evidence of abuse then either. So, State Defendants conspired within those days to fabricate a case against us using “false allegations regarding “Elijah,” and “old,” “closed” and “ruled-out” cases which is “illegal” and eludes too “fraud.”

In their “conspiracy,” State Defendants went all the way back to 1996 UTMB Medical Records and Information to build their 2001’ case against Plaintiff’s.

Something is “very wrong,” when “closed” and “ruled-out” cases involving Dr. Lukefahr, Cheryl Triplett, UTMB Hospital and staff which result in “no” findings of wrongdoing in 1998 and 1999, can suddenly “come-back-to-life” because of the same people in 2001, and then all of a sudden, there’s a case. This is suspect.

The mere implication involves “Double-Jeopardy,” and elude to “fraud” and “conspiracy.” Plaintiffs were forced to defend ourselves against “allegations” 1) we were already “exonerated” of and 2) Cheryl Triplett, her subordinates and others had already previously “investigated, closed and ruled-out.” Then, they each got up in Court and testified about it all over again.

“Massive” volumes of UTMB and other Medical Records had to be subpoenaed in 2003, at the cost of Taxpayers, to again disprove allegations “disproved” years earlier. The case was a sham, illegal, and billing, unnecessary.

Plaintiffs should not have been prosecuted in 2001, for cases which had no merit in 1998 and 1999. Those cases should have never been mentioned in CPS’ 2001 CPS Case against Plaintiffs to begin with. The Defendants were “malicious” and “negligent” by their actions in doing so.

If there wasn’t any basis to remove our children by law “then” using the same information, then there shouldn’t have been any in 2001 using that information either? This proves “conspiracy,” and an attempt by Cheryl Triplett, her subordinates and Affiliates, to defraud the Government and Taxpayer’s, using “false, old and ruled-out” cases and information.

Both CPS and UTMB Hospital's own records confirm that based on the very same information gathered from 1996 through 1999, there just wasn't a CPS case there to begin with. Which is why previous CPS referrals, cases and investigations, resulted in "closed" and "ruled-out" cases in the first place.

"Why in the world" State Defendants, Dr. Lukefahr and others would use that very same information again, then "reuse it" throughout State Proceedings up to Trial for a "third CPS case," eludes to "fraud and conspiracy, and, establishes "motive" and "intent."

Defendants Cheryl Triplett, Dr. James Lukefahr, Leann Stubbs, Richard King, Martha Livingston, Cheryl McCarty, Dr. Silva, Jack Lawrence, CASA and other Defendants all acted "willfully" and "maliciously" in Plaintiffs case. Each were "negligent" and acted in "bad faith."

The fact that the "scams works," means the State Process is "corrupt." No one watches what State Defendants and there Affiliates do except the State, and they're part of the conspiracy.

There are no "case-by-case-audits." Too much money is being made, and too many family's lives are being destroyed due to fabricated cases while the State "protects" its interests instead of our precious children.

In a "cover-up," State Defendants led State and Federal Courts to believe the "December 21, 2001" date was irrelevant, and that CPS removed "all" of our children because of, and due, to circumstances surrounding events of December 27, 2001, when in reality CPS' entire case evolved around incidents which occurred December 21, 2001.

Testimony during Trial confirmed CPS took custody of our baby and Ordered the removal of “all six” of our children December 23, 2001.

According to the Law, State Defendants had “10-days” in which to hold a “hearing” after taking our children from us. CPS Defendants missed the deadline.

In a cover-it-up, CPS Defendants simply “changed” the dates and facts to reflect the “date of removal” as December 27, 2001 which “then” put them “within” the limits required by State Law, and made the entire removal of our children, “illegal.”

Children’s Protective Services and UTMB Hospital could not “legitimately” bill the Government or Taxpayers for abuse or neglect which did not occur, as in our case.

State Defendants, Dr. Lukefahr and UTMB etc., needed enough time too:

1) “concoct” another case which “looked good” on paper and in court 2) gather enough officials and medical staff to corroborate “newly concocted” false allegations and build their case, and 3) conspire with “caller’s” and “reporter’s” to derive a plan to “entrap” us and take our children. Defendant’s case wasn’t about evidence of abuse or neglect, but instead a scam and Judge Radcliffe’s agenda and public proclamation “never” to give me my children.

State Defendants fraudulently filed the December 27, 2001 date, as the “date of removal” for all six of my children on “Official Court Documents,” in both Federal and State Courts to substantiate billing for services and make them “appear legit.” It was a deliberate attempt, on the part of the Defendants, including Officials, to “mislead” this Court.

The December 23, 2001 date was “crucial,” which is why CPS kept it secret. It also means CPS and UTMB fraudulently billed for services.

To cover-up the fact that CPS “broke-the-law” to take our children, CPS “broke-the-law” to conceal the truth.

The disclosure of the December 23, 2001 “as the actual date of the removal” (of our children) by a CPS worker was so “crucial,” that it nearly ended the “2003 Trial.

Plaintiffs ask this Court to “overrule” the lower Courts decision regarding “Full-Custody” of our children as a matter of Law, and, to review the legality, and/or “lack thereof regarding their removal.

The disclosure of State Defendants “secret date” early on, would have: 1)forced CPS to return all of our children to us immediately, as a matter of Law; proven the Defendants lied and conspired their case against us; and then exposed their conspiracy.

CPS should have had to returned our children: Lennon, Jourdan, Christopher, Christian, and Anna Stasia and Elijah Blue to us, “a long time ago,” had the Law been adhered too.

The Defendants named in this lawsuit, along with others, took “full-part” in the “scam” and “cover-up.” There was too much money at stake to chance the truth being disclosed in court. The State never admits its wrong until Federal investigators get involved. It’s an “Enron-of-a-mess” which someone truly needs to investigate.

The facts in our case are “suspicious,” should have alerted “just” officials, and caused them to question the “legitimacy” and “legality” of CPS’ 2001 case against Plaintiffs. State Defendants had no legal grounds to take Plaintiff’s children as a matter of the Law.

The “fraud” and “deception” here in Galveston involves officials making decisions for CPS. For this reason, all evidence of illegal wrongdoing by the Defendants simply got “covered-up,” and there was enough funds going around to do it.

Government, State and Taxpayer money should “not” be used to “cover-up” fraud and conspiracy committed by State Officials. Which, is exactly what’s happened in our case.

From State benches, official decisions are made in court which get all co-conspirators in this Statewide Scam “paid,” and family’s, “family-less.”

In Galveston, we and other families were run in-and-out of the courtroom in assembly line fashion like “sheep for slaughter.”

For money and personal agenda’s, lifelong decisions impacting the rest of our lives were casually made in a matter of minutes.

While CPS Defendants and Staff, CASA, Prosecutor’s, Foster Parents and UTMB etc., laughed in Court and all the way to the bank at our family’s expense, our family was separated, and the loving relationship we all once shared, “shattered.”

State Defendants “snatched” our children from us then scattered and placed them with total strangers like “puppies.” How do you explain that to a 2, 4, 5, 6, 12 and 13 year-old child?

I listened to one of my son’s cry “recently” about what happened and it’s been nearly three-years. I watched another with “blood-shot” eyes beg me to take him home, when I couldn’t. Our children aren’t puppies, their Americans. And we, a family.

The real problem here in Galveston is that Black American and Hispanic Families are not considered “real” families by Children’s Protective Services, just “potential” CPS cases. And our children “mere” wards of the State, or candidates for adoption or the States Foster Care System, which bring in money.

State Defendants “abused” abuse-hotlines. The majority of the “callers” which reported to the system were funneled through agencies or entities, closely affiliated with CPS (i.e. UTMB Hospital, Police, or the Education System etc.).

In a joint effort, Ms. Stubbs, Dr. Lukefahr and others simply made “repeated” CPS referrals whenever they were needed, in the absence of abuse or neglect as required by Law. Had there been an actual “emergency” CPS Defendants would have removed our children December 21, 2002, but didn’t. So they conspired to do later.

CPS wasn’t receiving enough “caller’s” from citizens, so it devised a way to mandate hospitals, schools, daycares and other facilities who take care of children to be involved. Statistics confirm, the majority of “caller’s” come from State-Affiliated Agency’s.

By stark contrast, “abuse” calls from Foster Homes, Adoptive Parents and State Facilities housing children taken into State Custody, are not listed nor tallied.

Unfortunately, no one hears about these cases until a child is dead or, “SENT TO AFRICA.” I’m fighting that my children will “never” become one of those statistics.

Abuse which occurs to children as the result of State Placements, Adoption or by a Foster Parent are not included in States Statistics. The State doesn’t give those numbers. There is no Federal “way” to report CPS abuse.

Consequently, incidents of the abuse and neglect involving our children were “overlooked,” “concealed,” and “covered-up.” And, there were “many!”

The Government and Taxpayer’s have the Right to know what’s going on “inside” these places and what’s happening to our children. We’re entitled to know every detail of what happened to our children while in State Custody. Including information “blotted and blanked-out” by the Defendants. We were “privy” to this information during Trial. Our Defense was compromised and we lost custody as the result of the actions of the Defendants.

Our innocent children did not have someone they could report CPS abuse too while “wards” of the State.

“Several” CPS Documents confirm that on “several” occasions, State Defendants ignored our children’s “outcries of abuse” by Mary Obialo(their Foster Parent), then forced them to remain in her care.

CPS Records also indicate that our children were “threatened” by Ms. Obialo after reporting the incidents. Cheryl Triplett, Martha Livingston, Jack Lawrence, Christine Mangle, Terri Ward and CASA all “failed to protect” our children involving this and other “threatening” incidents. The Defendants were negligent in doing so.

According to the U.S. Constitution, our children are American’s too. Each one of them had the Right to be protected from abuse and neglect. CPS was “supposed” to “protect” them by Law, but “did not.” All of the Defendants named in this Lawsuit was “negligent,” responsible, and should be held accountable for each incident of abuse and neglect which occurred to our innocent while in State Custody.

State Placements are “unmonitored.” Abuse or neglect gets “covered-up” on a “massive” scale, when it shouldn’t. Then Taxpayers and the Government foot the bill for medical expenses or even worse, funerals. CPS Defendants did more harm than good regarding our children.

Medical, police and photo evidence confirm our children were assaulted and neglected by my mother, with whom State Defendants placed them. As a victim of her violent “fury” and fists, it’s just a matter of time before something else happens unless she’s apprehended, and our children are taken from her and given too us.

This system is very biased and opens wide the door for “CPS abuse and Fraud. It also gives CPS, which isn’t monitored case-by-case, “Carte-Blanche” to abuse its State-given authority. This is exactly what CPS does here in Galveston under the Direction of Cheryl Triplett. As well as, “why” and “how” our family got “inducted into the CPS-Hall-Of-Shame!”

Our family, like so many others, unwillingly got “drafted” into the CPS system.

It is “absolutely” by no coincidence, that of the many Hospitals and Doctor’s which examined our children, UTMB Hospital is the “ONLY” Medical Facility which repeatedly made CPS referrals regarding our family, while others made “none.” UTMB and CPS records do prove that, State Defendants have repeatedly shown a consistent “pattern” of harassment, intimidation, threats and making actual CPS referrals, for years.

From what Plaintiffs saw and experienced, most CPS cases don’t go to Trial. That’s because CPS Galveston, under the Direction of Cheryl Triplett is “ferocious” against Parents, and “notorious,” especially among Black and Hispanic Communities for intimidation, harassment, threatening techniques and, “blackmail.”

State Defendants told us we were suspected of a crime, but never informed us of our Rights. Consequently, every word we spoke to them was used against us in Court for more than 16-months, including the State Trial. CPS made their entire case long before the State appointed us Court-Appointed Attorneys. It's procedure and a routine part of the State scam.

A. The Safety Plan

State Defendants "coerced" my husband into signing a "Safety Plan Agreement" without an attorney present which he did not understand, promising if he signed it, they would leave our family alone. Of course they lied.

"The Safety Plan was used to defraud the Government and Taxpayers, take our children from us, entrap Plaintiffs, and to Terminate our Parental Rights.

The Safety Plan was the "crux" of CPS 2001 Case against Plaintiffs. Its importance resonated throughout the entire case.

"The Safety Plan" has been mentioned by practically every official involved with our case, including: Cheryl Triplett, Richard King, Cheryl McCarty, UTMB Hospital Medical Records, Leann Stubbs, The CPS Regional Director and The Ombudsman Office and The Defendants 12/29/01 "Original Petition" to Terminate our Parental Rights.

Neither Texas State Law or the U.S. Constitution allows the removal of children on the basis of "A Safety Plan."

According to the "Ombudsman Office," the "Safety-Plan Agreement, which Richard King also signed and "breached," was "the reason" CPS removed our children from us and not "abuse or neglect" as State Defendants led the State and the Government to believe. Defrauding the Government and Taxpayers as the result of our case.

"The Safety Plan Agreement" was signed by "both" Richard King (CPS) and Mr. Bell, and not only Mr. Bell as CPS claims on Official Documents. The Safety Plan gave Plaintiffs "30-days" in which to comply. State Defendants took action to remove our children "only 2-days" after it was signed, breaching their own "agreement."

The Safety Plan was not signed until after the "investigation" was over. This proves conspiracy and an attempt by the Defendants to conspire a case against us, which they did eventually do.

Plaintiffs were "not under any obligation to comply with an agreement which had not yet been signed.

The Safety Plan Agreement was signed at UTMB Hospital, and not at our residence where the CPS "investigation" started and ended. However, Cheryl Triplett, Martha Livingston, Leann Stubbs, UTMB Medical Records etc., "made" like it was signed at our residence with my (Sheila Bell) knowledge, when it wasn't. My signature is "nowhere" on that Document. Both Parents did "not" agree to the terms of "The Safety Plan" as CPS has implied and lied on several Official Documents.

I Sheila Renee Bell was not under any obligation too comply with an agreement that I knew absolutely "nothing" about.

The Safety Plan was a “binding” agreement made between two people. Of which both Mr. King and Mr. Bell signed. Richard King, on the behalf of CPS, breached that agreement.

The Safety Plan Agreement signed on 12/21/01, was one of the original basis CPS used to determine to remove Plaintiffs children, and “not” abuse or neglect as required by law. Thus, the entire removal was “illegal.”

The Safety Plan Agreement was presented to Mr. Bell “before” the State had appointed any of us Attorneys. Since Criminal allegations were alleged during the “initial CPS investigation on 12/21/01 and involved Police, the Defendants and Police should have both “read us our Rights” and at least informed us that we had the Right to Counsel “before” coercing us to talk to them.

By the time the State did appoint Plaintiffs Attorneys, the Defendants had already conspired a case against us and devised a scheme to entrap us and take our children from us. This was not Due Process and a clear violation of our Civil Rights.

Richard King and Cheryl McCarty, under the direction of the Supervisors harassed our family with “five-more-visits” until evening to comply with a “Safety Plan Agreement which had not even been signed by anybody as of yet. Then, they “coerced” Mr. Bell into signing it under “false pretenses,” claiming that if he did, the case would then be over. Which of course was never true.

I, Sheila Bell was not present at the signing and under no “obligation” whatsoever to comply to it.

What State Defendants perpetrated against our family was “Government-Sponsored-Professional-Blackmail-for-Ransom.” Our children were the pay-off.

On January 7, 2002, State Defendants made it abundantly clear to me they would not return our children to us, allow us to visits our children or give us custody, unless we gave-in to their demands, and “separated,” our family in spite of our innocence.

Plaintiff’s had to plead guilty to false allegations and ourselves become “wards” of the State to be “considered” as placements, retain custody or receive visits with our children. This was a farce, illegal, Unconstitutional and “Blackmail.”

We were simply “besieged” with an “onslaught” of legal documents and CPS “jargon, we simply did not understand as with other parents.

The U.S. Constitution does “not” force anyone to violate Law or surrender our Rights to get our children back. If the U.S. Constitution does not force us to do it, then why should State Law? The two clash “head-on” and are “contrary” to one another.

There is simply “no justice” for biological parents under current Texas Family Law as long as the Defendants have anything to do with the “System.” There’s so much corruption going on secretly inside Galveston Courtrooms that “Justice is suffocated.”

In CPS cases, it’s always about the money. The State “fraudulently” used our family to get it.

Defense Attorney’s are “well aware” of the State-scam but too afraid to “speak-out” fearing they’ll loose their jobs or repercussions. One of my former-attorney’s told me that the State takes children for “Adoption” purposes. That same Attorney also told me “... the “D.A” had you (me) “set-up” to be arrested...” She knew.

Defense Attorney’s don’t fair too well representing parents “pleading” innocent as I did, and fear repercussions from the State.

During our State Trial our Attorney's were "bullied" by the Prosecution creating a "tense" Courtroom environment. There was nearly a "Courtroom-brawl" during Trial instigated by the Prosecution. Christine Mangle threatened my attorney. Our defense team was forced to represent us in a "very-hostile" Courtroom environment, while being "harassed and intimidated" by the Prosecution.

Our Defense Attorney's could not represent us, "in peace," without "fear of repercussions or retaliation," which continued "after" the State Trial.

CPS documents confirm, State Defendants already had Foster Parent, "Mary Obialo" assigned for our children, "before" Police and CPS completed their "initial" investigation December 21, 2001. The document proves, Plaintiffs were "set-up" by Police and State Defendants in a conspiracy.

The CPS system here in Galveston is a system of "rampant" fraud, child and parent abuse, bias, prejudice, racial profiling and oppression, perpetrated against minorities, poor, low-income and biological parents

The Children's Protective Services (CPS) is a "power-horse" run-amid. "Justice" simply gets "lost," here in Galveston, amid the States "iron-clad-clique" of family and friends.

In Plaintiffs case, State Judge Suzanne Schwab-Radcliffe presided until it went to Trial. The Judges own "Brother" was part of the D.A. and involved with our case. This was "unethical."

Det. Joey Quiroga is the relative of Galveston's Mayor during the 2001 case CPS initiated against us. Det. Quiroga also witnessed Richard King (CPS) admit our case was "over" but also took part the removal of our children from us, put them in "jail," then emotionally and physically traumatized them.

The report I filed with the Galveston Police involving the incidents suspiciously came up "missing."

Hearings and other State proceedings were "rigged" and "decided" before Plaintiff's ever entered the Courtroom.

No parent can receive a "fair hearing" or "due process" under such circumstances. Plaintiffs did not receive fair hearings on this basis.

Case in point, by the time Plaintiffs and our Court-Appointed Attorney's arrived for the December 17, 2002 Hearing regarding our children, our "youngest four children" per Judge Radcliffe, our children were "...already-enroute-to-Phoenix..." Tickets had already purchased, and plans already finalized, "before" we got there. Judge Radcliffe recorded those proceedings. The actual tape of the proceedings gives a "far-better" picture as to injustices Plaintiff's endured by State Defendants and during the State Process. (Please refer to Judge Radcliffe tape)

No family can receive "a fair hearing" or "due process" under these circumstances. Plaintiffs' were prevented by State Defendants from receiving "due process" and "fair hearings" throughout the State Process regarding our children.

Galveston it appears is a "small-town" bringing-in, "big-bucks" and "massive" local, State and Federal funding via CPS, UTMB Hospital and all other affiliates. I, Sheila Rene Bell, am a "Whistleblower," exposing the State-Scam.

An obvious “bias” exists against “biological parents” among State Defendants, CPS Staff, UTMB Hospital Staff, Law enforcement and State Judges here in Galveston.

In this State-scam, Local, State and Federal funds are used “exclusively” by CPS, UTMB, and State Judges for Adoptive and Foster Parents against “biological Parents,” which is exactly what happened in Plaintiffs case and continues to occur in others here in Galveston.

State Defendants, as well as State Officials discriminated against Plaintiffs during and throughout the course of our case.

According to the Galveston Daily News, State Judges are “public” staunch supporters of the States own “Adoptive” and “Foster Care” systems, and not “biological parents,” including State Judge Suzanne Schwab-Radcliffe who presided over Plaintiffs case and a “huge” majority of others.

State Defendants, including the Judge, discriminated against Plaintiffs, and violated our family’s Civil Rights. State Judge, Susan Schwab-Radcliffe, is part of the State-Scam.

Using “judicial authority,” the Judge Ordered “all” negative recommendations made by State Defendants and volunteers for the “illegal” case Defendants obtained against Plaintiffs.

State transactions were routinely funneled through the Associate Judge. She approved “all” CPS and other recommendations at the State Level. No CPS recommendations were refused, including travel expenses to send our children as far away from us as legally possible. The Judge kept her “public” promise she made, 2-months into our case, “never” to give me my children, at the expense of our family, Taxpayers and the Government.

State Defendants “publicly” sponsored, supported and attended “Gala’s” and “Benefits” organized by State agency’s which support Adoption or Foster Parents, “exclusively” during the course of our case.

There was absolutely “no-way” Plaintiffs could have received, retained custody or been “reunified” as a “family” in any State “venue.” The State atmosphere was and is not “contusive” to return children to “biological parents” or “reuniting” families.

In essence, State Defendants and Volunteer’s publicly supported the very same people, (via party’s, benefits and gala’s) they took and gave our children too, at Taxpayers and the Governments expense. It is “State Sponsored-Discrimination” since no similar events are held for “biological parents.” Should State Defendants be allowed to “party” at Plaintiffs expense through its “illegally” obtained case?

Local, State and Federal Funds is supposed to be used in the behalf of “all” families, and not merely causes benefiting State-owned programs and close Affiliates.

News articles from “The Galveston County Daily News” depict State Defendants bias against Plaintiffs as “biological parents.”

While Plaintiffs were grieving the separation of our family caused by the Defendants, State Defendants: supported the same people which took our children; held “party’s, benefits and galas” for them; and, served as “board-members” on each other’s “Boards” which support State Adoptive and Foster Parent Systems.

In essence, The State, as well as State Defendants “exclusively” support agency’s which take children from “biological families.” State Defendants did so in Plaintiffs case. They were all connected in “one-way-or-another.”

A definite “conflict-of-interest” exists between Plaintiffs and State Defendant’s when the State is allowed to support their own agenda’s, via “State Adoption” and State Foster Care Systems etc., using our innocent children, Local, State and Federal Funding against us to “illegally” obtain CPS cases. State Defendant’s “fed” their own causes “using” our children and family to garnish funds.

State Defendants and those “affiliated,” with them, “clearly” were public proponents of “State Adoption and Foster Care Systems,” and discriminated against as “biological parents.”

The States’ bias was extremely evident during State Proceedings. Not a single “Black” or “biological parent” received custody of their children during State Proceedings, including Plaintiffs. No parent can “win” in this situation.

As proof, according to an article in “The Galveston County Daily News,” Judge Susan Schwab-Radcliffe candidly admitted, she “...see’s about 180 cases of child abuse... each year...25% are adopted. The rest either go to guardians or the System as permanent wards of the State...”

The article confirms that admittedly, the Judge in our case does “not” return children, and “does not reunify family’s” in Galveston Family Courtrooms, which is a “clear” violation of Statutory Law.

The Cheryl Triplett, Christine Mangle, Martha Livingston, Richard King, Cheryl McCarty, Terri Ward, CASA, and Jack Lawrence each “refused” to “reunify” our family. The rest of the Defendants helped them do it. Each violated “clearly established law” in doing so and are not entitled to any sort of immunity whatsoever for their actions.

This “very obvious” practice of prejudice and bias and discrimination, also practiced by the Defendants, violated the Civil Rights of our entire family. This was the very same Judge which presided over the majority of all State Proceedings and Hearings in our case, up too the State Trial.

Her decisions, the attitude and atmosphere of the entire State, CPS and other Defendants involved, “adversely affected” the outcome of the Trial and decisions regarding Custody of our children. The State Judge not only kept her word to herself “never” to give me my children, but she had the State-given Authority to keep her promise and use that “authority” against, which she did.

This also means that Cheryl Triplett, Martha Livingston, Richard King, Cheryl McCarty and Jack Lawrence all committed “perjury” and made false statements on its “Original Petition” to Terminate our Parental Rights and all other “Official” documents, by claiming they did so, since it was “impossible” given the Judge’ statements and the actions of the Defendants as described in Plaintiffs Complaint.

It also explains and accounts for the reasons why they were all so “hasty” to make arrangements for our children to be “adopted” and placed with any one other than Mr. Bell and I, so early on in the CPS case and “before” State Hearings or Proceedings had even commenced. All of their decisions were “pre-made.”

The article confirms that “zero” children are returned to their parents in the State Courtrooms in Galveston.

Due Process cannot prevail in such an environment. How can any family receive a fair hearing or Trial under these circumstances? The truth is, parents don’t. Plaintiffs did not receive “fair hearings, a fair trial, due process, our children, visits or custody” due to the States obvious bias against “biological parents.” No parent can.

Admittedly, the State Judge in our case: is a Public proponent of “adoption;” a public proponent of State Foster Care Systems; does not “reunite” families and; does “not” return children to their “biological parents.”

The Judges public views, opinions and admissions were a “blatant” violation of the Law and Plaintiffs Civil Rights. As well as, a “blatant” contradiction and violation of the Judges own December 28, 2001 Court Order, which stated “reasonable efforts” were made... to “reunify” Plaintiffs family, when none were made. CPS’ job is to “reunite” families and “protect” children. State Defendants did neither in Plaintiffs case.

Familiar names “resurfaced” among State Defendants as they each publicly “rallied” for causes that exclude “biological parents.”

In one issue of the "Galveston County Daily News," "... Trudy Davis (Advocate for Children), Dr. James Lukefahr (UTMB), Cheryl Triplett (CPS) and the District Attorney all were in attendance at the same fundraiser. They were also involved in Plaintiffs case.

While this benefit was being held by the very people, around about the same time, involving the same Defendants which took Plaintiffs children, Defendants partied and supported each other at the "gala" while serving on each other's "boards" as Board Members. Each then testified in each other's behalves against Plaintiffs. Plaintiffs could not receive fair hearings, a fair Trial, or "due process" under these circumstances.

Evidence confirms that Dr. Lukefahr is an "expert witness" who routinely testifies and builds cases using "false" information "for" the Defendants in CPS cases, and provides "Sworn Affidavits" to substantiate "false" allegations to make cases stick. Evidence also confirms, CPS routinely builds cases against parents using his testimony. Dr. Lukefahr was both CPS and the States "key witness" during our Trial and was on the "witness-stand" longer than any other witness during our 3-week Trial. Many of the cases in which he testifies are "not" bona-fide cases. Evidence confirms he has done this on several occasions.

Cheryl Triplett was the Regional Director for CPS for the entire Gulf Coast Area and authorized the approval to remove our children." The D.A.'s office served as prosecution for CPS' against Plaintiffs.

State and Local Officials public, personal and professional affiliations with each other "intertwined" during our case and made it "impossible" for Plaintiffs to receive a fair Trial, and custody of our children.

In another issue of "The Galveston County Daily News," a "Party" organized during our case by the States "Child Welfare Board of Galveston," in attendance were, Judge Suzanne Schwab-Radcliffe, CASA'S Dawn Roberts, CPS' Cheryl Triplett, CPS Workers, and Staff etc., the very same people which took Plaintiff's children, all publicly supporting causes which segregate against, and exclude "biological parents."

These "parties" were biased, prejudicial, segregated and discriminated against Plaintiffs and "biological" as parents in general.

State Defendants and others affiliated with the State held benefits, gala's and parties together during the course of Plaintiffs case, then, testified against Plaintiff's in Court. This was certainly not the atmosphere where Plaintiffs could receive "Justice, Due Process, A Fair trial" or "legal-full-custody" of our children. No parent can among this "iron-clad-clique" of family and friends. It just "ain't" possible!

According to "The Galveston County Daily News," Judge Radcliffe brought "Adoption Day" to Galveston along with her "friend" in "Tarrant County" who "happens-to-be" the organizer of "National Adoption Day. There is a "connection."

"Tarrant County" also "happens-to-be" the same county Judge Radcliffe placed my sons with their dad (Lennon Brown) who tested "positive" for drugs "twice" via Court-Ordered drug tests results ordered by Judge Radcliffe disclosed during Court.

Correspondence between Galveston and Tarrant County's confirm that Judge Radcliffe and Tarrant County was aware that Mr. Brown's "Home Study" was "not approved" due to his drug use, while State Defendants "ignored" Plaintiffs letters about Mr. Browns drug use.

Placing a child with a “drug user” is not in the best interest of any child, and violates State Law. Judge Radcliffe and State Defendants “knowingly” violated “clearly established Law by proceeding with the placement, then “conspired” in a “cover-up” to conceal it. My Sons had a Constitutional to be protected “from” such environments but remain with their drug-using dad to this very day. That Placement was and is “illegal.”

Per the Galveston Daily News and Judge Radcliffe, it was Tarrant and Galveston County eventually brought “Adoption Day” to Galveston. This poses a “very” serious “conflict of interest.”

What this means, is that while supporting her “Adoption-Agenda” with her “friend in Tarrant County,” Judge Radcliffe used her “Judicial Power” to take measures to have Plaintiff’s children “Adopted” less than 5-months into our case at the “recommendation” of State Defendants.

This compromise exposes a “serious” conflict of interest. Both Counties compromised and violated “clearly established Law by placing my children with a “drug user” and also violated their Constitutional Rights.

“NO PARENT CAN RECEIVE OR RETAIN CUSTODY OF THEIR CHILDREN IN AN ATMOSPHERE WHICH “PROMOTES” STATE ADOPTION AND FOSTER CARE.”

Evidence proves the very same State Officials and State Volunteers who: took our children; made decisions to remove our children and adopt them too others besides us, their biological and custodial parents; placed them in the States Foster Care System, and made “all” negative and adverse recommendations against us which caused our children and family to remain separated, all publicly “promoted” the very same agency’s and people they sent our children too during the same period.

This poses a “very” serious “conflict of interest,” since there was “absolutely” no-way Plaintiffs could receive or retain custody in an “atmosphere” which openly “breeds” opposition and bias against “biological parents” and “minorities.”

Further evidence proves the people involved with making decisions regarding our children and family, publicly participated in festivities that oppose “biological parents, and “promote” State Adoption, Foster Care, and other closely Affiliated State Agency’s while serving as “Board Members” on each other’s Boards for the same causes. These people “excluded” Plaintiffs as a “biological family,” and discriminated against us in doing so. The Defendants literally “partied” while, during the separation of our family, at the expense of our family’s pain.

The evidence shows that some of the Defendants, State Officials, Court-Appointed Volunteers by the State and other’s were public “proponents” of Adoption and State Foster Care Systems, which “opposed” and “excluded” us as “biological parents,” then passed our children through the very same “agency’s” which they support. These Defendants “discriminated” against us, while committing “fraud” to acquire funds.”

According to articles in "The Galveston County Daily News,"

On November 14, 2004, State Judge Suzanne Schwab-Radcliffe candidly admitted she "...see's about 180 cases of child abuse or neglect in Galveston County each year... About 25 percent are adopted. The rest either go to guardians or stay in the system as permanent wards of the state.

It was Schwab-Radcliffe who decided to bring National Adoption Day to Galveston County. Her Friend in Tarrant County organized the nationwide program there... In April, Schwab-Radcliffe got a group together: CPS workers, attorney's, judges and sheriffs deputies... They collected a list of foster care children and families who wanted to adopt them..."

All of these people and agency's, were the very same people involved with taking our children from us. No wonder no one would listen when we told the truth. There are in on the "scam."

According to this article, the State Judge returns absolutely "zero" children to their families. The people and agency's she mentioned, help her do so. She fed her "cause," our children. This is wrong and definitely a "conflict-of-interest." No Parent can receive or retain their own children because the Judge doesn't allow it. Under any circumstances.

The Judges actions and rulings as a State Official violated Statutory Law and Plaintiffs "Constitutional Right" to be a Family. Her bias' prevented it from occurring.

This was a “blatant” disrespect and violation of the Rights of Plaintiffs and all other “biological families” which have gone through the Judges Courtroom. She is a “public proponent” of Adoptive and Foster Parents, not “biological parents” like Plaintiffs. Not a single word in this article favorably mentions “biological parents.”

“Tarrant County,” the place in which she and her “friend” together brought “Adoption Day” to Galveston, also happens to be the very same County which my sons were “illegally” placed in spite of the fact that the “Home Study” was not approved due to their Dad’s drug use; the Judge and other State Affiliate’s were well aware of the fact that their father was “unemployed;” he lived in unsuitable living conditions; and tested positive for drug use.

In a conspiracy, both County’s and “friends” covered-up the problems with the placement, and violated my sons’ Civil Rights and Statutory Law in the process.

The State Judge and her cohorts literally “ruined” our family and other’s while obtaining “good-publicity,” making herself and her cause “look-good” at our expense.

In a December 6, 2004 issue of “The Galveston Daily News,” (Family Judge) Judge Yarbrough is featured posing in a portrait with “Court Appointed Advocates.” The article “discriminates” and “excludes” biological parents in that it “promotes” the very people and Agencies which involve the children of biological parents. They take our children, to send them to the places they “promote.” This was wrong and discriminatory.

A November 23, 2004 article of “The Galveston Daily News,” according to one reader, Judge Yarbrough is the “... presiding Judge of the Court sponsoring National Adoption Day in Galveston County...” and “... has exclusive jurisdiction of the Children’s Protective Services...”

In a December 21, 2004 issue of the Galveston Daily News, Judge Yarbrough is featured in a "front-page" article "promoting" Adoptive Parents. The article discriminates and excludes "biological families" and puts us all in an "unfavorable" light.

The "percentages and ratios" of Black, Hispanic, poor, low-income and biological families are "too high." These Judges are making it happen.

The article mentions others which participated in the "festivities" including: "Michelle Parsons"... many attorney's, CPS workers, sheriffs deputies and volunteers," all of which were the same people and agency's involved in the removal of our children and separation of our family.

The very people mentioned in this "public" article are the same people who separated our family, and "routinely" separate others via CPS cases on a daily basis.

We never stood a chance at Justice because they were all "too closely affiliated" with each other for the same causes, same purposes and same financial interests. None of which included "biological parents and families."

Why should Officials be allowed to "party and publicize" their agenda's at our expense, using funds which should be allocated and used for "all" Texans, including "biological parents and families, including Plaintiffs?" Their public practices are "discriminatory."

Children are being set-up for "adoption" by Judges who send them there to promote adoption agenda's at the recommendation of CPS. State Defendants "illegally" obtained our case and others they needed to make it happen. Other Defendants helped.

Almost 75% of these children are Black and Hispanic, exclusively. This practice discriminates against minorities. Its “unfair,” “Unconstitutional,” and probably “illegal.”

Plaintiffs do contest the Constitutionality of these “public advertisements” and “promotional” ads for Adoption and other State Affiliated Agency’s since there were “none” promoting Biological Family’s like Plaintiffs.

The Defendants involved discriminated against us by their “ads,” as they put “biological parents” “in a “bad light,” and are “unfavorable” towards parents like us.

A November 1, 2004 features CPS Worker Michelle Parsons who was instrumental in concealing CPS’ illegal 2001 case against Plaintiffs.

This Worker does not deserve honors for ruining our children’s emotional states or separating our family through illegal means. People should not be “honored” for filing cases to defraud the Government, but investigated.

The article mentions “Martha Livingston,” the very CPS Supervisor which knew and stated during the January 7, 2001 Mediation, that a sexual abuse exam had not been performed on our son as indicated and filed by Officials. It was Ms. Livingstons responsibility to alert proper officials regarding false allegations made against us, and expose fraud, instead of covering-it-up.

An October 18, 2001 article features the “Child Advocacy Center” in a portrait of “Board-Members” for a fundraiser and “gala.” This is another State-Affiliated Agency, with financial ties.

A September 6, 2004 article features a Galveston Judge with “CASA Volunteers” are a State-Affiliated Agency with local ties.